



Via ECF only

June 2, 2020

Honorable Paul A. Engelmayer
United States District Court, SDNY
40 Foley Square, Room 1305
New York, New York 10007

Re: Roc Nation LLC v. HCC International Insurance Company, PLC
Venue: US District Court - Southern District of New York
Case No.: 1:19-cv-00554-PAE

Dear Judge Engelmayer:

This firm is legal counsel to Houston Casualty Company (“HCC”), improperly pled as HCC International Insurance Company, PLC, regarding the above-referenced matter. We write to request permission, pursuant to § 4.B of Your Honor’s individual rules and practices and Order dated May 29, 2020 (Docket No. 118) to submit the following documents in redacted form:

1. HCC’s letter seeking to file a discovery motion;
2. HCC’s May 23, 2020 letter regarding discovery issues (Exhibit A);
3. HCC’s May 26, 2020 letter regarding discovery issues (Exhibit B);
4. Portions of the transcript of the deposition of Hal Blackman (Exhibit E).

Redactions to the above documents have been made as narrowly as possible and in accordance with the requests of Plaintiff’s counsel. Further, as the transcript of the deposition of Desiree Perez (Exhibit F) has been marked confidential, counsel for Plaintiff has requested that it be sealed in its entirety.

In accordance with Your Honor’s instructions, the documents have been uploaded via ECF with a limited viewing level restricting viewing to selected parties as we await Your Honor’s review of these documents and decision.

Defendant seeks to file the aforementioned documents under seal as they contain sensitive and confidential information pertaining to Plaintiff’s business operations, financial information, and proprietary information as well as like information pertaining to individuals and entities that are not parties to this litigation. This information is not available within the public domain and was contemplated by the parties when they jointly drafted and entered into the confidentiality order entered by Your Honor on August 6, 2019. *See* Document No. 42.

Good cause exists for granting this request to file the above-referenced documents under seal so that it may include these documents in HCC’s letter-motion seeking leave to file a motion to compel discovery.

Thank you for your time and attention to this matter.

Respectfully submitted,
/s/George J. Vogrin
George J. Vogrin



Granted. The Court is satisfied that HCC's proposed redactions and sealing requests are narrowly tailored and warranted. If sealing requests are necessary in the future, the Court expects the parties will employ this careful approach.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

June 4, 2020